



February 17, 2026

Five9 certifies that it commits to respond to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls, and that some of the voice traffic that originates on its network is authenticated with STIR/SHAKEN, and the remainder of the voice traffic that originates on its network is subject to a robocall mitigation program.

The filer also certifies that the attached searchable PDF details the specific reasonable steps it has taken to avoid originating illegal robocall traffic as part of its robocall mitigation program, and, if applicable, the type of extension or extensions it received under 47 CFR § 64.6304.

Regards,

Crispen Maung

Crispen Maung (Feb 19, 2026 10:29:20 PST)

Crispen Maung

SVP Compliance and Privacy

Attachment - Five9 Robo-calling mitigation procedures

Five9's procedures to avoid originating illegal robocall traffic include:

- All customers are required to contractually commit to the lawful use of Five9 services. Five9 reserves the right to suspend or terminate any customer for which Five9 has a good faith belief that the customer is using the service in violation of federal, state or local laws, rules or regulations.
- Five9 performs OFAC and various denied party reviews of all new customers before providing services and has random periodic OFAC reviews performed for existing customers.
- Five9 performs Proactive Monitoring and Enforcement – we get a monthly report from all clients and all the outbound dials that were made the previous month. Not specific phone numbers, but how many campaigns, number of outbound dials, dispositions, abandonment rates, etc. We review these campaigns looking for outbound dials over 100k with high abandonment rates. We send these clients proactive compliance notices asking them for compliance documentation and request they lower the rates to below 3%. The main focus is them adjusting settings to get their rates down into compliance. The clients will typically self-adjust or meet with a solution engineer to correct settings. We will monitor rates after that meeting on a monthly basis to see if the rates are dropping below 3%. If they do get into compliance, we send them a go-to-go compliance notice. If they do not, we can terminate them from Five9.
- Reactive Monitoring and Enforcement – Since Five9 owns the telephone numbers their clients are broadcasting on caller ID, every time there is a regulatory investigation, the regulator reaches out to Five9 for information. We send the client a reactive letter which basically asks how they are using the dialer and for what types of campaigns. The letter also asks them to provide their compliance documentation. If they have none, they either need to develop them or hire a third-party to help them. If they cooperate and are willing to comply, we work with them and give them some time to implement. If they are unwilling to cooperate and/or don't care about compliance, we terminate the relationship.
- Autodialer reviews- Five9 only allows AD functionality (pre-recorded messages) for non-solicitous message campaigns. We review each and every campaign prior to approving or denying usage of the functionality. If the campaigns have the required verbiage and we deem them to be non-solicitous messages, we approve the service. If we deem them to be solicitous or plans or programs of solicitation, we deny them.
- General consulting – Five9 provides customers and Five9 account managers for general consulting type calls about the rules and regs.
- Training – Five9 performs annual training for all Five9 employees on Five9's compliance obligations to comply FCC regulations.

Five9 Robo-calling Mitigation Filing, Feb 2026

Final Audit Report

2026-02-19

Created:	2026-02-17
By:	lucette.bixler@five9.com lucette.bixler@five9.com (lucette.bixler@five9.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAAnFsDJdfJQC1f4bo3gqQNVJyQ9twl_hTw

"Five9 Robo-calling Mitigation Filing, Feb 2026" History

 Document created by lucette.bixler@five9.com lucette.bixler@five9.com (lucette.bixler@five9.com)
2026-02-17 - 4:17:35 PM GMT

 Document emailed to Crispen Maung (crispen.maung@five9.com) for signature
2026-02-17 - 4:17:38 PM GMT

 Email viewed by Crispen Maung (crispen.maung@five9.com)
2026-02-19 - 6:28:51 PM GMT

 Document e-signed by Crispen Maung (crispen.maung@five9.com)
Signature Date: 2026-02-19 - 6:29:20 PM GMT - Time Source: server

 Agreement completed.
2026-02-19 - 6:29:20 PM GMT